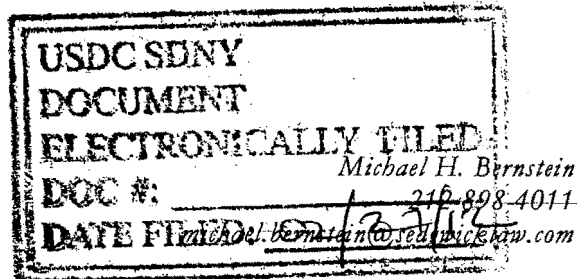
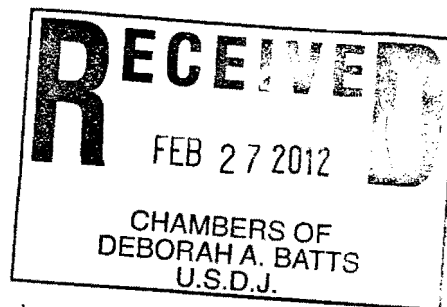


Sedgwick_{LLP}**MEMO ENDORSED**

February 24, 2012

Via Overnight Mail

Hon. Deborah A. Batts, U.S.D.J.
 United States District Court For The
 Southern District Of New York
 500 Pearl Street
 New York, NY 10007-1312



Re: *ICC Industries Inc., et al. v. United Healthcare Services LLC, et al.*
 Civ. Act. No.: 11-cv-08671 (DAB)
 SDMA File No.: 03246-000147

Dear Judge Batts:

This office represents Defendant United Healthcare Services LLC ("United") in the above-referenced matter.

MEMO ENDORSED

We write this letter motion request for an extension of time to appear and respond to the Complaint in this matter, up to and including March 28, 2012, pursuant to Rule 6(b)(1)(A), FED. R. Civ. P.

MEMO ENDORSED

Plaintiff ICC Industries Inc. and United entered into an Administrative Services Agreement (the "Agreement"), which is the subject of this lawsuit against United. Pursuant to the terms of the Agreement, however, Plaintiffs were required to refer the instant dispute to non-binding mediation before commencing a lawsuit against United. Since Plaintiffs failed to refer this dispute to mediation, this action was prematurely commenced against United.

Additional time is needed in order for counsel to confer with Plaintiffs' counsel, who has reviewed the Agreement's Mediation provision and is willing to consider dismissing this action against United without prejudice. If Plaintiffs' counsel does not agree to dismiss this action against United, additional time is needed for United to prepare a motion to dismiss this action on the ground that all of Plaintiffs' claims must first be submitted to mediation, or in the alternative, to compel Plaintiffs to mediation.

In accordance with Your Honor's Individual Practices, we respectfully set forth that:

MEMO ENDORSED

granted
 10/18/12
 02/27/12

Hon. Deborah A. Batts

Re: *ICC Industries Inc., et al. v. United Healthcare Services LLC, et al.*

February 24, 2012

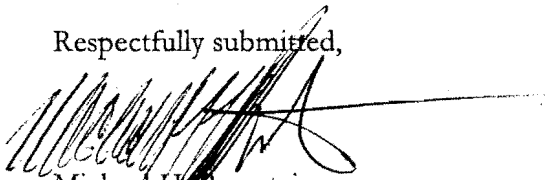
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MEMO ENDORSED

- (1) United's time to answer or otherwise respond to the Complaint was originally extended to February 27, 2012;
- (2) This is United's second request for an extension of time;
- (3) Your Honor endorsed United's initial request for an extension of time by Order dated January 31, 2012 (*see* Doc. No. 18); and
- (4) Plaintiffs' counsel, Robert J. Basil, consented to this request on February 24, 2012.

Thank you for your consideration of this matter.

Respectfully submitted,



Michael H. Bernstein
Sedgwick LLP

cc: Robert J. Basil, Esq. (*via email*)
Daniel P. Jaffe, Esq. (*via email*)

SO ORDERED
Deborah A. Batts

DEBORAH A. BATTS
UNITED STATES DISTRICT JUDGE

02/27/12

MEMO ENDORSED